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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00468-BNW

**Plaintiff,**

V.

## **Stipulation for an Order Directing Probation to Prepare a Criminal History Report**

SANTOS TORRES-NOVERON,  
aka "Santos Roman Torres-Noveron,"  
aka "Santos Ramon Torres-Noveron,"  
  
Defendant.

## Defendant

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Pon, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, and for the United States of America, Rene L. Valladares, Federal Public Defender, and by C. Baron, Assistant Federal Public Defender, counsel for Defendant SANTOS-NOVERON, that the Court direct the U.S. Probation Office to prepare a report concerning the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has

extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 14th day of June, 2022.

Respectfully Submitted,

RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

/s/ *Jeremy C. Baron*  
JEREMY C. BARON  
Assistant Federal Public Defender  
Counsel for Defendant SANTOS  
TORRES-NOVERON

/s/ Jared L. Grimmer  
JARED L. GRIMMER  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:22-mj-00468-BNW

Plaintiff,

## **Order Directing Probation to Prepare a Criminal History Report [Proposed]**

SANTOS TORRES-NOVERON,  
aka "Santos Roman Torres-Noveron,"  
aka "Santos Ramon Torres-Noveron,"

**Defendant.**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 16th day of June, 2022.

  
BRENDA N. WEKSLER  
UNITED STATES MAGISTRATE JUDGE